

Planning Department  
Arun District Council,  
Civic Centre,  
Maltravers Rd  
Littlehampton,  
West Sussex,  
BN17 5LF

5 June 2026

Dear Sir / Madam,

**Ecological Response to Consultation Comments - Land Off Summer Lane, Pagham, West Sussex**

Please find enclosed updated ecological information submitted in response to the comments received from the Council's Ecological Adviser.

The following amendments and additional information have been provided:

- Biodiversity Opportunity Area (BOA): The Ecological Impact Assessment has been updated to acknowledge that part of the site lies within the Chichester Coastal Plain Biodiversity Opportunity Area. An assessment has been included demonstrating that the area of the BOA within the site will remain undeveloped and that the proposals will not prejudice the strategic objectives of the BOA.
- Supporting Habitat Assessment and Wintering Birds: Additional information has been included regarding the site's historic land use and cropping history. Cropping records covering the period 2010/11–2025/26 have been reviewed and incorporated into the assessment. This demonstrates that only one year (2022/23) can be confidently confirmed as providing suitable winter cereal habitat for dark-bellied brent goose.
- Biological Records: The report has been updated to include Wetland Bird Survey (WeBS) data obtained from the British Trust for Ornithology (BTO) for the nearest relevant count sector associated with Pagham Harbour SPA.
- Habitat Survey: The habitat assessment has been updated following a further survey undertaken in April 2026. The updated survey information supplements the original winter survey and provides additional detail regarding the botanical composition and condition of habitats across the site during the growing season.
- Biodiversity Net Gain: The Biodiversity Metric and habitat proposals have been reviewed. Native hedgerow planting has now been incorporated into the proposed habitat creation and enhancement strategy in response to the comments received. Whilst ornamental hedgerows remain necessary within residential curtilages, strategic and boundary planting proposals have been amended to utilise native hedgerow instead of lines of trees. An updated post-development habitat plan has also been provided to demonstrate how onsite Biodiversity Net Gain will be delivered and secured.
- Breeding Bird Enhancements: The ecological enhancement recommendations have been updated to include additional measures for breeding birds, in response to the comments received regarding the use of the site by notable bird species.

With regard to the comments relating to errors within the Biodiversity Metric, specifically references to discrepancies between pre- and post-development habitat areas, we have reviewed the submitted metric but have been unable to identify the specific issues being referred to. We would therefore be grateful if the Council's Ecological Adviser could provide further clarification regarding this so that these can be reviewed and addressed if necessary.

We trust the enclosed information addresses the matters raised and look forward to receiving confirmation that sufficient information is now available to allow determination of the application.

Yours sincerely,

Izabel



Izabel Phillips  
Principal Ecologist / Company Director